



**Toni R. Acton**  
Director

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August 7, 2008

Via Electronic Submission

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE:    **EX PARTE**  
      CG Docket 03-123, In the Matter of Telecommunications Relay Services  
      and Speech-to-Speech Services for Individuals with Hearing and Speech  
      Disabilities and WC Docket 05-196, E911 Requirements for IP-Enabled  
      Service Providers

Dear Ms. Dortch:

The attached letter was sent to Ms. Cathy Seidel, Chief, Consumer and Governmental Affairs Bureau on August 7, 2008 and should be entered in the record of the above referenced dockets.

If you have any questions, please contact the undersigned at 202-457-3039.

Sincerely,

Toni R. Acton  
Director

Attachment



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Ms. Cathy Seidel, Chief  
Consumer and Governmental Affairs Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: **EX PARTE**

CG Docket 03-123, In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities and WC Docket 05-196, E911 Requirements for IP-Enabled Service Providers

Dear Ms. Seidel:

The recent order in the captioned dockets<sup>1</sup> has spurred several Internet-based TRS providers to take action in preparation for implementation. Industry discussions at both the regulatory and operational levels are underway. Representatives from Sprint Nextel Corporation; Healinc Telecom, Inc. (LifeLinks); Viable, Inc.; CSDVRS, LLC; GoAmerica, Inc.; Sorenson Communications, Inc.; [Snap!VRS](#); [Hamilton Relay, Inc.](#); [Hawk Relay, LLC](#); [UURelay, Inc.](#); and [Communications Access Center](#) ("Joint Parties") have participated in those discussions and provide the following assessment of progress being made.

The order provides a clear directive to 1) begin assigning telephone numbers, 2) ensure that those numbers have 911 capability, and 3) establish a database that links telephone numbers to Internet addresses. While the first two directives can be unilaterally accomplished by Internet-based TRS providers working with numbering partners and the 911 infrastructure, those functions that are particularly related to the TRS Numbering Administrator ("TNA") and the TRS Numbering Directory ("TND") database must wait for the awarding of the contract<sup>2</sup> through the federal procurement process. Specifically, since the actual interface design and the processes inherent to the TND are as yet unknown<sup>3</sup>, Internet-based TRS providers are unable to substantially progress with their operational designs until those specifications are defined.

<sup>1</sup> Report and Order and Further Notice of Proposed Rulemaking released June 24, 2008 (FCC 08-151).

<sup>2</sup> See Solicitation Number RFQ09000022 at [www.fbo.gov](http://www.fbo.gov).

<sup>3</sup> See Solicitation Statement of Objectives Background section, "The FCC's intent is to award a performance-based contract, without specifying in detail how the work is to be accomplished." and Objectives section, "As determined by the Contracting Officer (CO), portions of the successful Contractor's technical proposal may be incorporated into the resultant contract. The response to this Statement of Objectives (SOO) should provide the FCC with solutions, services, processes and other deliverables to meet the needs of implementing and operating the Internet-based TRS Telephone Numbering Directory."

The Joint Parties want to ensure that the FCC understands that expeditious selection of a suitable TNA and rapid deployment of the TND are essential. An August 11, 2008 end to the RFQ window and a prompt contract award must promptly yield technical and process details so that adequate development, testing and deployment can be accomplished with any chance of meeting the December 31, 2008 deadline. There are perhaps two dozen providers independently waiting to gear-up design teams, but they cannot move forward without specifications.

The Joint Parties stand ready to immediately work with the selected TNA. We believe this is a milestone event for the deaf/hard-of-hearing constituency and look forward to implementing solutions that are secure and functionally-equivalent for these users.

If you have any questions, please contact the undersigned at 202-457-3039.

Sincerely,

Toni R. Acton  
Director

cc: Dana Shaffer  
Nicole McGinnis  
Thomas Chandler  
William Dever  
Michael B. Fingerhut, Sprint Nextel  
Wesley N. Waite, Sr., Healinc Telecom, Inc. (LifeLinks)  
Carla Mathers, Viable, Inc.  
Sean Belanger, CSDVRS, LLC  
Kelby Brick, GoAmerica, Inc.  
Michael D. Maddix, Sorenson Communications, Inc.  
Mark Goff, Snap!VRS  
Jeff Rosen, Snap!VRS  
David O'Connor, Hamilton Relay, Inc.  
Samuel Hawk, Hawk Relay  
Julie Miron, Communications Access Center  
Bill McClelland, UURelay, Inc.